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March 2, 2022

**Via ECF**

Hon. Frederic Block  
United States District Judge  
United States Courthouse  
225 Cadman Plaza  
Brooklyn, New York 11201

**RE: Liu, et.al. v. Chau, et.al.  
20-CV-6369 (FB)(RER)  
United States District Court for the Eastern District of New York**

Dear Judge Block:

We are the attorneys for Plaintiffs Chen Xia Liu and Chen Hua Liu in the above entitled action.

On February 10, 2022, your Honor issued an order substantially denying Defendants' motion to dismiss which was filed by Defendants **(Docket Entry # 34)**.

On February 23, 2022, Victor Tsai, Esq. attorneys for Defendants Hok Kwai Chau, Wing Fung Chau, Salena Chau, Mei Yang Ko, Wing Fung Home Realty Group Inc. and Wing Fung Chau D/B/A Wing Fung Realty Group, filed a motion for reconsideration **(Docket No. 36)** of Your Honor's February 10, 2022 decision and order.

Your Honor's individual part rule "2(A)" states that "For motions other than discovery motions, in all cases where the parties are represented by counsel, except habeas corpus / prisoner petitions and Social Security and Bankruptcy appeals, **a pre-motion conference with the court must be requested before making any motions.**"

Defendants' counsel, Victor Tsai, Esq. did not file a letter seeking a pre-motion conference as required pursuant to Your Honor's individual part rule "2(A)", prior to his having filed the motion for reconsideration as **Docket No. 36**.

The motion was filed by Defendants' counsel, Victor Tsai, Esq. without the pre-motion conference and there is no briefing schedule.

It is respectfully requested that the Court reject the motion for reconsideration as Docket No. 36 filed by Defendants' counsel, Victor Tsai, Esq. for Defendants' counsel, Victor Tsai, Esq. having failed to follow Your Honor's individual part rules.

Thank you very much.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Gary Rosen", with a stylized, cursive script.

Gary Rosen